



Liangjin ZHENG(Pro Se)
Chang GAO (Pro Se)
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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

AMAZON.COM, INC., a Delaware) CASE No. 2:24-cv-01931-MLP
corporation; and AMAZON.COM SERVICES)
LLC, a Delaware limited liability corporation,) ANSWER TO PLAINTIFF'S COMPLAINT
Plaintiffs,)
v.)
LIANG JIN ZHENG, an individual;)
CHANG GAO, an individual; and DOES 1-10,)
Defendants.)

ANSWER TO COMPLAINT

Defendants PINCHAO JIANG(Pro Se)and LURONG LI (Pro Se),make the following
answer to the allegations in Plaintiff's Complaint:

I. INTRODUCTION

1. Paragraph 1, Lack enough information to respond to Plaintiff's allegations.
2. Paragraph 2, Lack enough information to respond to Plaintiff's allegations.
3. Paragraph 3, Lack enough information to respond to Plaintiff's allegations.
4. Paragraph 4, Lack enough information to respond to Plaintiff's allegations.
5. Paragraph 5, Lack enough information to respond to Plaintiff's allegations.
6. Paragraph 6, Lack enough information to respond to Plaintiff's allegations.

II. PARTIES

7. Paragraph 7, Lack enough information to respond to Plaintiff's allegations.
8. Paragraph 8, Lack enough information to respond to Plaintiff's allegations.
9. Paragraph 9 , Defendant's name is admitted. All others are denied.

1 10. Paragraph 10, Defendant's name is admitted. All others are denied.

2 11. Paragraph 11, Lack enough information to respond to Plaintiff's allegations.

3 12. Paragraph 12, admitted.

4 **III. JURISDICTION AND VENUE**

5 13. Paragraph 13, admitted.

6 14. Paragraph 14, admitted.

7 15. Paragraph 15, admitted.

8 16. Paragraph 16, admitted.

9 17. Paragraph 17, admitted.

10 18. Paragraph 18, admitted.

11 **IV. FACTUAL BACKGROUND**

12 19. Paragraph 19, Lack enough information to respond to Plaintiff's allegations.

13 20. Paragraph 20, Lack enough information to respond to Plaintiff's allegations.

14 21. Paragraph 21, Lack enough information to respond to Plaintiff's allegations.

15 22. Paragraph 22, Lack enough information to respond to Plaintiff's allegations.

16 23. Paragraph 23, Lack enough information to respond to Plaintiff's allegations.

17 24. Paragraph 24, Lack enough information to respond to Plaintiff's allegations.

18 25. Paragraph 25, Lack enough information to respond to Plaintiff's allegations.

19 26. Paragraph 26, Lack enough information to respond to Plaintiff's allegations.

20 27. Paragraph 27, Lack enough information to respond to Plaintiff's allegations.

21 28. Paragraph 28, Lack enough information to respond to Plaintiff's allegations.

22 29. Paragraph 29, Lack enough information to respond to Plaintiff's allegations.

23 30. Paragraph 30, Lack enough information to respond to Plaintiff's allegations.

24 31. Paragraph 31, Lack enough information to respond to Plaintiff's allegations.

25 32. Paragraph 32, Lack enough information to respond to Plaintiff's allegations.

26 33. Paragraph 33, Lack enough information to respond to Plaintiff's allegations.

27 34. Paragraph 34, Lack enough information to respond to Plaintiff's allegations.

28 35. Paragraph 35, Lack enough information to respond to Plaintiff's allegations.

36. Paragraph 36, Lack enough information to respond to Plaintiff's allegations.

37. Paragraph 37, Lack enough information to respond to Plaintiff's allegations.
38. Paragraph 38, Lack enough information to respond to Plaintiff's allegations.
39. Paragraph 39, Lack enough information to respond to Plaintiff's allegations.
40. Paragraph 40, Lack enough information to respond to Plaintiff's allegations.
41. Paragraph 41, Lack enough information to respond to Plaintiff's allegations.
42. Paragraph 42, Lack enough information to respond to Plaintiff's allegations.
43. Paragraph 43, denied.
44. Paragraph 44, denied.
45. Paragraph 45, denied.
46. Paragraph 46, admitted.
47. Paragraph 47, admitted.
48. Paragraph 48, admitted.
49. Paragraph 49, admitted.
50. Paragraph 50, admitted.
51. Paragraph 51, Lack enough information to respond to Plaintiff's allegations.
52. Paragraph 52, Lack enough information to respond to Plaintiff's allegations.
53. Paragraph 53, denied.
54. Paragraph 54, denied.
55. Paragraph 55, denied.
56. Paragraph 56, denied.
57. Paragraph 57, denied.
58. Paragraph 58, denied.
59. Paragraph 59, denied.
60. Paragraph 60, denied.
61. Paragraph 61, denied.
62. Paragraph 62, denied.
63. Paragraph 63, denied.
64. Paragraph 64, denied.
65. Paragraph 65, denied.

1 66. Paragraph 66, denied.

2 67. Paragraph 67, denied.

3 68. Paragraph 68, denied.

4 69. Paragraph 69, denied.

5 70. Paragraph 70, denied.

6 71. Paragraph 71, denied.

7 72. Paragraph 72, denied.

8 73. Paragraph 73, denied.

9 74. Paragraph 74, denied.

10 75. Paragraph 75, denied.

11 76. Paragraph 76, denied.

12 77. Paragraph 77, denied.

13 78. Paragraph 78, denied.

14 79. Paragraph 79, denied.

15 **V.CLAIMS**

16 **FIRST CLAIM**

17 **(Against all Defendants)**

18 **Misrepresentation of Copyright Infringement Under 17 U.S.C Section 512(f)**

19 80. Amazon incorporated by reference the allegations of the preceding paragraph as
20 though set forth herein.

21 81. Paragraph 81, Lack enough information to respond to Plaintiff's allegations.

22 82. Paragraph 82, denied.

23 83. Paragraph 83, denied.

24 84. Paragraph 84, denied.

25 85. Paragraph 85, denied.

26 86. Paragraph 86, denied.

27 **SECOND CLAIM**

28 **(Against All Defendants)**

Breach of Contract

1 87. Amazon incorporated by reference the allegations of the preceding paragraph as
2 though set forth herein.

3 88. Paragraph 88, denied.

4 89. Paragraph 89, denied.

5 90. Paragraph 90, denied.

6 91. Paragraph 91, denied.

7 92. Paragraph 92, denied.

8 93. Paragraph 93, denied.

9 94. Paragraph 94, denied.

10 95. Paragraph 95, denied.

11 96. Paragraph 96, denied.

12 97. Paragraph 97, denied.

13 **THIRD CLAIM**

14 **(Against All Defendants)**

15 **Tortious Interference with Contractual Relationship**

16 98. Amazon incorporated by reference the allegations of the preceding paragraph as
17 though set forth herein.

18 99. Paragraph 99, Lack enough information to respond to Plaintiff's allegations.

19 100. Paragraph 100, denied.

20 101. Paragraph 101, denied.

21 102. Paragraph 102, denied.

22 103. Paragraph 103, denied.

23 **FOURTH CLAIM**

24 **(Against All defendants)**

25 **Fraud**

26 104. Amazon incorporated by reference the allegations of the preceding paragraph as
27 though set forth herein.

28 105. Paragraph 105, denied.

106. Paragraph 106, denied.

1 107. Paragraph 107, denied.

2 108. Paragraph 108, denied.

3 109. Paragraph 109, denied.

4 110. Paragraph 110, denied.

5 111. Paragraph 111, denied.

6 112. Paragraph 112, denied.

7 113. Paragraph 113, denied.

8 **FIFTH CLAIM**

9 **(Against All defendants)**

10 **Violation of Washington Consumer Protection Act, RCW 19.86.010,et seq.)**

11 114. Amazon incorporated by reference the allegations of the preceding paragraph as
12 though set forth herein.

13 115. Paragraph 115, denied.

14 116. Paragraph 116, denied.

15 117. Paragraph 117, denied.

16 118. Paragraph 118, denied.

17 **VI.PRAY FOR RELIEF**

18 119. Plaintiff's Pray for Relief is not an allegation, and therefore no response is required.
19 To the extent that a response is required, Defendants DENY that Plaintiff is entitled to any relief
20 whatsoever, including but not limited to the relief requested in Paragraph A through G.

21
22 DATED: December 20, 2024

23
24 Respectfully submitted

25
26
27 By:



28 Liangjin Zheng

By:



Chang Gao

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2
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5 corporation; and AMAZON.COM SERVICES)
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8 CHANG GAO, an individual; and DOES 1-10,)
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9

10
11 **PROOF OF SERVICE**

12 I am not a party herein, am over 18 years of age and reside in the state of Louisiana,

13 I hereby certify that I have mailed by United States Postal Service the document of
14 **Answer to Complaint** to the following:

15 Davis Wright Tremaine LLP
16 Scott Commerson,
17 350 South Grand Ave, 27th Floor
Los Angeles, CA 90071-3460

18
19 DATED: December 20, 2024

20 By: Hilary Yao

21 
22
23

24 Names and address of Defendants:

25 Liangjin ZHENG
26 Chang GAO
845 Sedona Pines Dr.,
27 Baton Rouge, LA 70816
Tel: 646-236-2761
28 t296011498@gmail.com

Liangjin Zheng / Chang Gao
845 Sedona Pines Dr.,
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DEC 26 2024

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WESTERN DISTRICT OF WASHINGTON

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